
L. LIN WOOD, P.C.
TRIAL LAWYERS

L. LIN WOOD
Direct Dial: (404) 891-1406
lwood@linwoodlaw.com

February 18, 2021

VIA ELECTRONIC MAIL

Paula J. Frederick, General Counsel
State Bar of Georgia
104 Marietta Street, NW Suite 100
Atlanta, GA 30303
paulaf@gabar.org

RE: *L. Lin Wood, 774588, State Disciplinary Board*

Dear Paula:

As you know, the State Bar of Georgia has instituted a grievance action against me and has separately demanded that I agree to a mental health examination by an unidentified individual. As you must acknowledge as true, the grievance action threatens my bar license and accordingly, my means of making a living. Likewise, any request for an independent medical examination, physical or mental, raises very serious issues of privacy, among other significant concerns.

I contend that the grievance action lacks factual and legal merit. To date, the Bar has not provided me with the alleged factual justification for the Bar's intrusive demand for a mental health examination and I am aware of no basis for this unprecedented demand on a member of the Bar of Georgia.

You also provided me with a list of 18 members of the Disciplinary Committee with their addresses who will hear the grievance the Bar filed against me. As you admitted, I have the right to investigate and challenge each of these members for their "competence, qualifications or objectivity." While I have initiated a lawful investigation of these members, I have a great deal of investigative work yet to be performed. By necessity, the investigation also must encompass officers of the State Bar and other related officials. I have enlisted a number of private individuals to assist me in locating and organizing publicly available information on each of the above individuals and have retained private investigators to further insure a thorough investigation. I am sure you understand the necessity for a thorough investigation given the political climate which exists in Georgia and throughout the nation at this time.

The actions filed against me raise serious issues of due process, equal protection, freedom of speech, medical privacy, and the lawful scope of the Bar's regulatory authority. My purpose in writing today is to simply request a reasonable extension of time to formally respond to the Bar's accusations, demands, and opportunity to challenge members of the committee. I am in the process of procuring counsel to represent me on all of these matters. As you can imagine, the

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search for counsel must extend outside of the State of Georgia and must encompass finding a litigator(s) experienced in the multitude of legal issues raised by the actions and conduct of the Bar. One of the lawyers under consideration resides in Texas so weather has created delays in those discussions. I am also presently handling matters for clients in New York, Washington, D.C., and Georgia. I have two cases pending before the United States Supreme Court, an appeal before the Eleventh Circuit, and the unresolved and active civil litigation with Wade, Grunberg & Wilson upon which the Bar is apparently in part relying in pursuing these various actions against me. I am also in the process of securing competent counsel to review and potentially pursue around the nation and in Georgia a large number of cases on my behalf for defamation, violations of my Constitutional rights, invasion of privacy, and tortuous interference with my business and business relationships.

With the above in mind, I respectfully request that the State Bar agree to the following reasonable extensions of time:

- (1) The filing of my challenges to the committee members on or before March 15;
- (2) The filing of my initial response to the demand for the mental health examination on or before March 15; and
- (3) The filing of my initial response to the grievance complaint on or before March 31.

I appreciate your consideration of this request and would likewise appreciate your prompt response to what I believe under the circumstances are very reasonable requests for extensions of time.

With professional regards,

Sincerely,



L. Lin Wood